

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Brandice Elliott, AICP, Development Review Specialist
JLS
Jennifer Steingasser, AICP
Deputy Director, Development Review & Historic Preservation

DATE: June 15, 2022

SUBJECT: ZC Case 22-17 – Set down Report for an application to rezone 0.48 acres from RA-1 (low- to moderate-density residential apartment zone) to RA-2 (moderate-density residential apartment zone).

I. RECOMMENDATION

The Office of Planning recommends the Zoning Commission (“Commission”) **set down** this application to rezone Lots 8, 9, and 20 in Square 1913, located at 3615 Norton Place, N.W., and 3427 and 3433 Wisconsin Avenue, N.W., from RA-1 to RA-2. On balance, the proposal **would not be inconsistent** with the Comprehensive Plan and **would be appropriate** for IZ Plus.

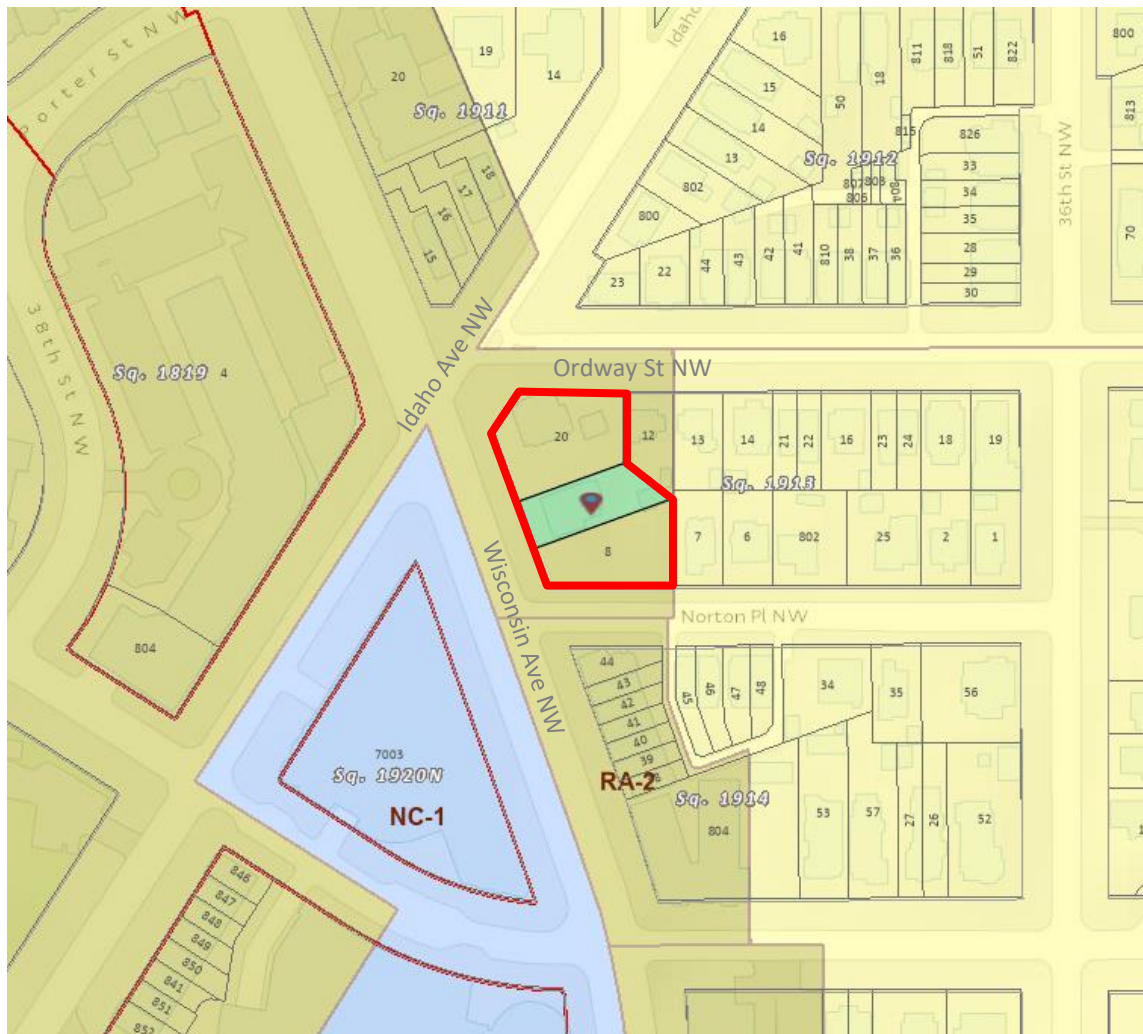
II. APPLICATION-IN-BRIEF

Applicant:	Sullivan & Barros, LLP for Wisco Wally, LLC
Proposed Map Amendment:	From RA-1 to RA-2
Address:	3615 Norton Place, N.W.; 3427 Wisconsin Avenue, N.W.; 3433 Wisconsin Avenue, N.W.
Ward and ANC:	Ward 3, ANC 3C
Legal Description:	Square 1913, Lots 8, 9, and 20
Property size:	20,879 square feet (0.48 acres)
Future Land Use Map Designation:	Moderate Density Residential
Generalized Policy Map Designation:	Neighborhood Conservation Area Future Planning Analysis Area
Historic District:	Cleveland Park Historic District

III. SITE AND AREA DESCRIPTION

The property is located along the east side of Wisconsin Avenue between Ordway Street to the north and Norton Place to the south. The lot has 165.80-feet of frontage along Wisconsin Avenue, 46.13-feet along Idaho Avenue, 106.64-feet along Ordway Street, and 72.32-feet along Norton Place.

The map below shows the location of the property outlined in red with the proposed RA-2 zone.



Abutting the properties to the east are detached and semi-detached residential buildings. To the west, across Wisconsin Avenue, are mixed-use buildings consisting of ground floor retail and residential uses that were constructed pursuant to PUDs (ZC 87-17 – McLean Gardens, and ZC 08-15A – Cathedral Commons). To the north, across Ordway Street, are detached and semi-detached buildings used as residential dwellings. To the south, across Norton Place, are attached, semi-detached, and detached buildings used as residential dwellings and offices.

The properties are currently developed with two detached residential buildings that are contributing to the Cleveland Park Historic District. The Applicant has indicated that the buildings would be relocated and reoriented along Ordway and Norton Streets. The Applicant will continue to coordinate with the Historic Preservation Office on this effort.

The subject lot is approximately one mile from the Cleveland Park Metro Station and the Tenleytown-AU Metro Station, which is about a 20-minute walk from the site. Wisconsin Avenue is a Priority Corridor Network, providing access to bus routes 31, 33, and 96.

IV. DEVELOPMENT CAPACITY OF EXISTING AND PROPOSED ZONES

The application proposes to rezone 20,879 square feet of land area from RA-1 to RA-2. The general purpose and intent of the existing RA-1 zone and the proposed RA-2 zone is described below:

Purposes of the RA zones (Subtitle F § 100.3):

- (a) Provide for the orderly development and use of land and structures in areas characterized by predominantly moderate- to high-density residential uses;
- (b) Permit flexibility by allowing all types of residential development;
- (c) Promote stable residential areas while permitting a variety of types of urban residential neighborhoods;
- (d) Promote a walkable living environment;
- (e) Allow limited non-residential uses that are compatible with adjoining residential uses;
- (f) Encourage compatibility between the location of new buildings or construction and the existing neighborhood; and
- (g) Ensure that buildings and developments around fixed rail stations, transit hubs, and streetcar lines are oriented to support active use of public transportation and safety of public spaces.

Existing RA-1 Zone (Subtitle F § 300):

- (a) Permit flexibility of design by permitting all types of urban residential development if they conform to the height, density, and area requirements established for these districts; and
 - (b) Permit the construction of those institutional and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive residential zones.
- The RA-1 zone provides for areas predominantly developed with low- to moderate-density development, including detached dwellings, rowhouses, and low-rise apartments.

Proposed RA-2 Zone (Subtitle F § 300):

- (a) Permit flexibility of design by permitting all types of urban residential development if they conform to the height, density, and area requirements established for these districts; and
 - (b) Permit the construction of those institutional and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive residential zones.
- The RA-2 zone provides for areas developed with predominantly moderate-density residential.

The following table compares the existing RA-1 zone to the proposed RA-2 zone:

	Existing Zone: RA-1	Proposed Zone: RA-2
Permitted Uses:	Single Household Dwellings, Flats, and Apartment Houses ¹	Single Household Dwellings, Flats, and Apartment Houses ²
Height:	40 feet max./ 3 stories	50 feet max.
FAR:	0.9 max. 1.08 (IZ)	1.8 max. 2.16 (IZ)
Penthouse Height:	12 feet max.	12 feet max. 15 feet mechanical max.
Lot Occupancy:	40% max.	60% max.
Rear Yard:	20 feet min.	15 feet min.
Side Yard:	8 feet min., if provided	4 feet min., if provided
Vehicle Parking:	Residential: 1 per 3 dwelling units in excess of 4 units	
Bike Parking:	Multiple Dwelling Unit Residential: Long Term, 1 space per 3 dwelling units; Short Term, 1 space per 20 dwelling units	
Loading:	Residential: not required if fewer than 50 dwelling units	
GAR:	0.4 min.	0.4 min.

V. IZ PLUS

IZ Plus is recommended in this case and the set-aside requirement would be appropriate pursuant to Subtitle X § 502 because:

1. The map amendment would rezone the property to RA-2, which allows a higher maximum permitted FAR than the existing RA-1 zone; and
2. The 2019 Housing Equity Report³ prepared by the Office of Planning and the Department of Housing and Community Development reports that:
 - a. Ward 3, within which the subject property is located, had 0.9 percent of the District's total number of affordable housing units as of 2018; and
 - b. The Rock Creek West Planning Area needs to produce 1,990 affordable units by 2025 to meet the affordable housing goals for the Area.
 - c. The Rock Creek West Planning Area did not contain any of the District's total number of affordable housing units as of 2018.

IZ Plus requires a higher affordable housing set-aside than Regular IZ, which prescribes a set-aside requirement based on either:

- a sliding-scale that is correlated to the total floor area built, or
- the amount of IZ bonus density built.

Rezoning applications only consider consistency with the Comprehensive Plan and not a specific development proposal. OP has provided two examples below to demonstrate possible IZ Plus set-

¹ These are general residential uses permitted in the RA-1 zone. For a complete list of permitted uses please refer to Subtitle U § 400.

² These are general residential uses permitted in the RA-2 zone. For a complete list of permitted uses please refer to Subtitle U § 400.

³ [Housing-Equity-Report](#)

aside requirements pursuant to Subtitle C § 1003.3 if a new residential development was built under the RA-2 zone at the subject property. The examples are based on a residential development that is stick-built (non-Type I construction) on the subject property (20,879 square feet).

Example 1 – Utilizes IZ Bonus Density

FAR Built:	2.16 IZ FAR (45,098 sq. ft. max.)
Regular IZ Set-Aside Requirement:	12.5% or 5,637 sq. ft.
Regular IZ Dwelling Units ⁴ :	6 units
Percent Increase in Total FAR Built	140%
IZ Plus Set-Aside Requirement:	20% or 9,020 sq. ft.
IZ Plus Dwelling units:	9 units

Example 2 – Does Not Utilize IZ Bonus Density

FAR Built:	1.8 FAR (37,582 sq. ft. max.)
Regular IZ Set-Aside Requirement:	10% or 3,758 sq. ft.
Regular IZ Dwelling Units:	4 units
Percent Increase in Total FAR Built:	100%
IZ Plus Set-Aside Requirement:	20% or 7,516 sq. ft.
IZ Plus Dwelling units:	8 units

In both examples above, the set-aside requirement would be 20 percent or more, which is the maximum IZ Plus set-aside requirement. The amount of residential floor area built in any future development under the RA-2 zone would determine the actual IZ Plus set-aside requirement. However, given the increase in maximum FAR permitted by the zone change, it is likely that under the majority of development scenarios that the set-side requirement would be (or close) to 20 percent.

VI. COMPREHENSIVE PLAN

As described in Chapter 1 Introduction, Section 104, the Comprehensive Plan is the centerpiece of a “Family of Plans” that guide public policy in the District. The Introduction goes on to note the “Citywide and Area Elements appear in separate sections of this document, and that they carry the same legal authority”. The Comprehensive Plan includes 13 Citywide Elements each addressing a topic that is District-wide in scope.

The Area Elements focus on issues that are unique to particular parts of the District. Many of their policies are place-based, referencing specific neighborhoods, corridors, business districts, and local landmarks. However, the policies are still general in nature and do not prescribe specific uses or design details. Nor do the Area Elements repeat policies that already appear in the Citywide Elements. They are intended to provide a sense of local priorities and to recognize the different dynamics at work in each part of Washington, DC. (Chapter 1 Introduction, Section 104.6) The subject site is located in the Rock Creek West Area Element.

⁴ OP typically uses a density factor 1,000 sq. ft. to estimate number of dwelling units.

Small Area Plans supplement the Comprehensive Plan by providing detailed direction for areas ranging in size from a few city blocks to entire neighborhoods or corridors. The subject site is not located in a neighborhood or corridor plan.

A. COMPREHENSIVE PLAN MAPS

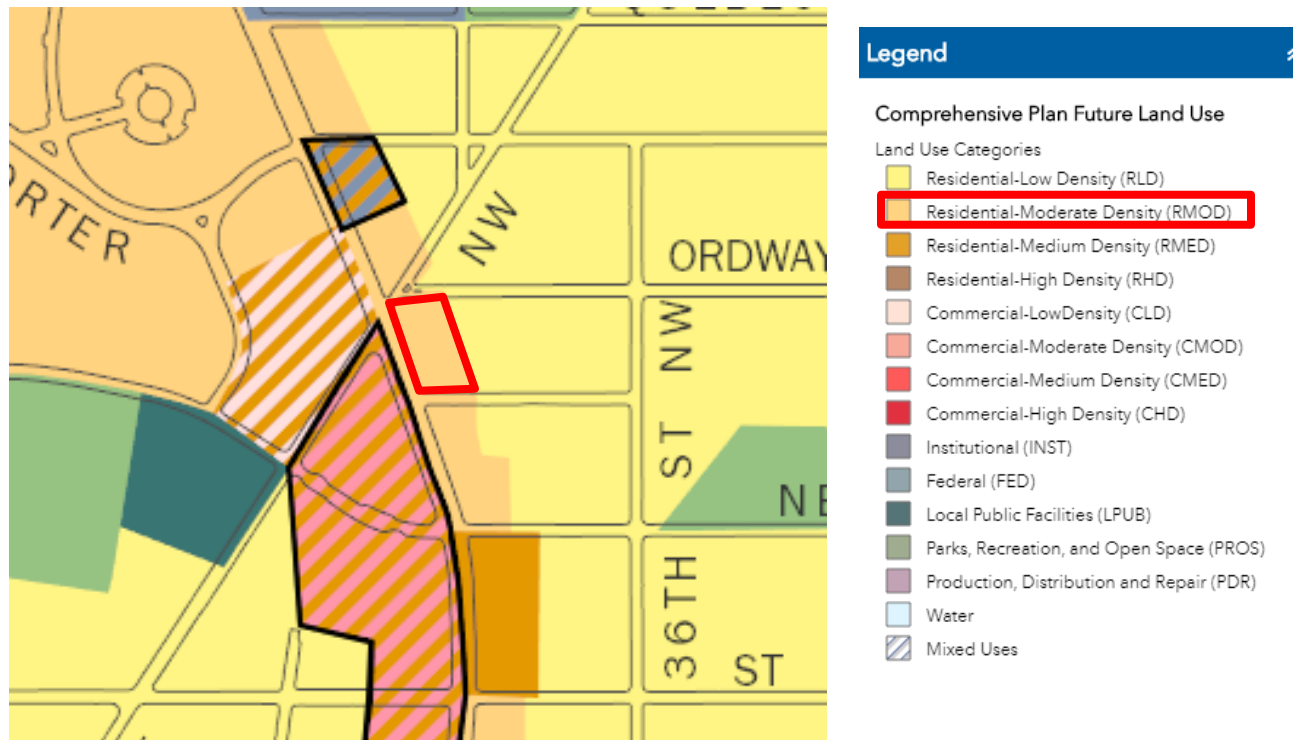
As described in the Guidelines for Using the Generalized Policy Map and the Future Land Use Map (Chapter 2 Framework Element, Section 228), the maps are intended to provide generalized guidelines for development decisions. They are to be interpreted broadly and are not parcel-specific like zoning maps; i.e. the maps, in and of themselves, do not establish detailed requirements or permissions for a development's physical characteristics including building massing or density; uses; or support systems such as parking and loading. They are to be interpreted in conjunction with relevant written goals, policies and action items in the Comprehensive Plan text, and further balanced against policies or objectives contained in relevant Small Area Plans and other citywide or area plans.

As described below, the proposed zoning map amendment would be not inconsistent with the map designations.

Generalized Future Land Use Map (FLUM)

The Future Land Use Map (FLUM) indicates that the site is appropriate for Moderate Density Residential. The Framework Element of the Comprehensive Plan describes the Moderate Density Residential category as follows:

Moderate Density Residential defines neighborhoods generally, but not exclusively, suited for row houses as well as low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartment buildings. In some neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). Density in Moderate Density Residential areas is typically calculated either as the number of dwelling units per minimum lot area, or as a FAR up to 1.8, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. ***The R-3, RF, and RA-2 Zone Districts are consistent with the Moderate Density Residential category, and other zones may also apply.*** 227.6 (Emphasis Added)



Generalized Policy Map

The Generalized Policy Map indicates that the site is designated as a Neighborhood Conservation Area and is located in a Future Planning Analysis Area. The Framework Element of the Comprehensive Plan describes Neighborhood Conservation Areas and Future Planning Analysis Areas as follows:

Neighborhood Conservation areas have little vacant or underutilized land. They are generally residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will typically be modest in scale and will consist primarily of infill housing, public facilities, and institutional uses. Major changes in density over current (2017) conditions are not expected but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by Comprehensive Plan policies and the Future Land Use Map. Neighborhood Conservation Areas that are designated “PDR” on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have historically provided. 225.4

The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section

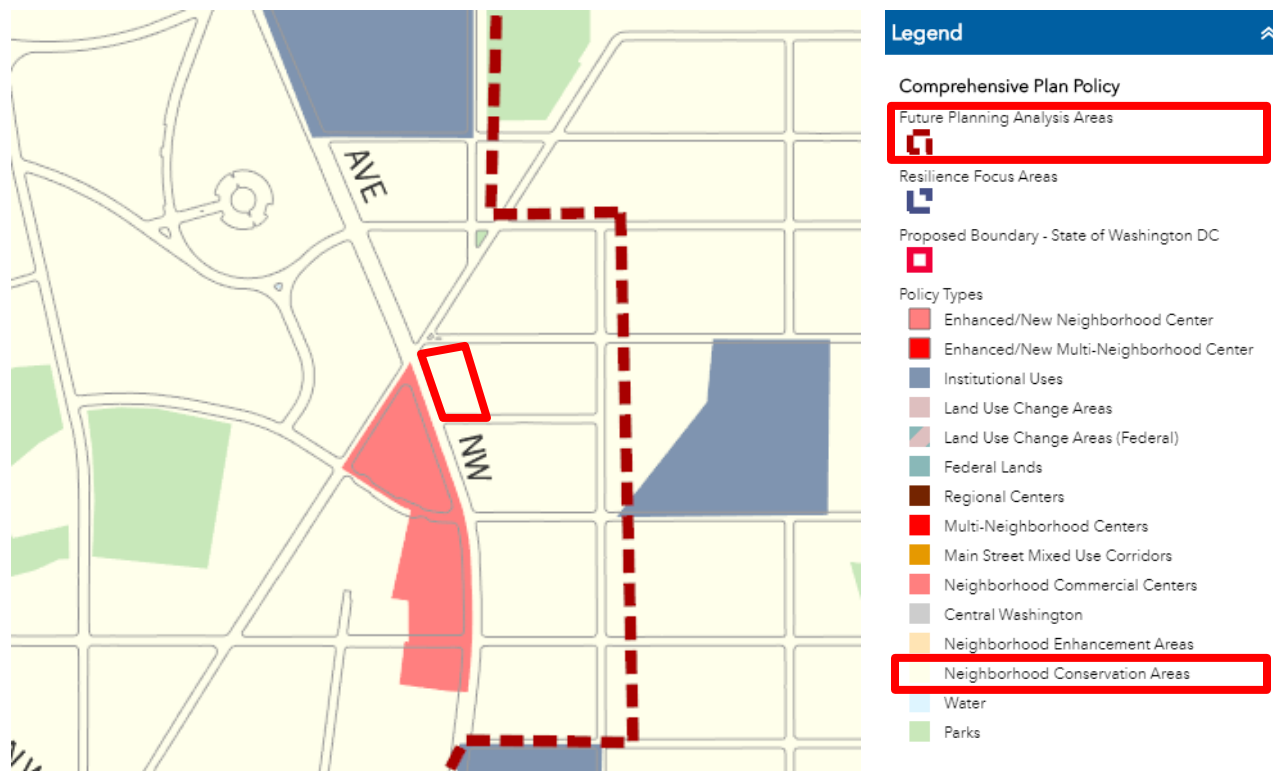
206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities. 225.5

Future Planning Analysis Areas As further discussed in Sections 2503.2 and 2503.3 of the Implementation Element, areas of large tracts or corridors where future analysis is anticipated to ensure adequate planning for equitable development. Boundaries shown are for illustrative purposes. Final boundaries will be determined as part of the future planning analysis process for each area.

Planning analyses generally establish guiding documents. Such analysis should precede any zoning change in this area.

The planning process should evaluate current infrastructure and utility capacity against full build out and projected population and employment growth. Planning should also focus on issues most relevant to the community that can be effectively addressed through a planning process. Individual planning analyses may study smaller areas than the Analysis Area.

For the purposes of determining whether a planning analysis is needed before a zoning change, the boundaries of the Future Planning Analysis Areas shall be considered as drawn. The valuation of current infrastructure and utility capacity should specify the physical or operational capacity both inside the boundaries and any relevant District-wide infrastructure available.



The proposed rezoning from the RA-1 to the RA-2 zone would not be inconsistent with the Comprehensive Plan's maps. The RA-2 zone would permit moderate density residential development with a maximum FAR of 1.8 and up to 2.16 for the provision of IZ units. The proposed zone would allow essential residential uses, including market rate and affordable dwelling units. The subject property's FLUM designation is equally consistent with the RA-1 zone and the RA-2 zone. The RA-2 zone would allow for additional density and would generate more affordable residential units.

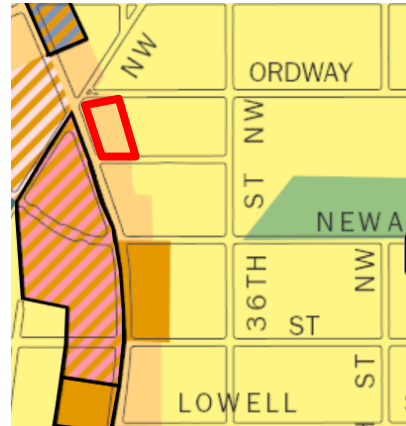
The Neighborhood Conservation Policy Map designation aims to conserve and enhance established neighborhoods, but not preclude development, particularly to address housing needs. This designation allows for compatible infill development, which would be supported by the RA-2 zone.

The subject lot is located in a Future Planning Analysis Area, which would require a future study that evaluates infrastructure and utility capacity, projected population, employment growth, and an analysis of issues that concern the community be conducted and precede any rezoning. However, section 2503.3 of the Implementation Element sets out scenarios where a rezoning may proceed without a planning analysis:

2503.3 Notwithstanding 2503.2, re-zoning proposals received prior to planning studies in these Future Planning Analysis Areas may be considered if the following occur or have occurred: a Small Area Plan, development framework, technical study, design guidelines, Planned Unit Development, master plan already approved by the National Capital Planning Commission, **or the re-zoning proposal would have been consistent with the 2012 Future Land Use Map.** (emphasis added)



2012 Future Land Use Map



2021 Future Land Use Map

In this case, the Future Land Use Designation of the property for moderate density residential was not changed during the update of the Comprehensive Plan, the re-zoning proposal would have been consistent with the 2012 Future Land Use Map and there are no plans to conduct a planning study for this block. As such, the proposed rezoning is appropriate.

B. COMPREHENSIVE PLAN POLICIES

Equity:

Background

Equity is a broad and encompassing goal of the entire District government. As explained in the Framework Element of the Comprehensive Plan,

[t]he District seeks to create and support an equitable and inclusive city. Like resilience, equity is both an outcome and a process. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality. 213.6

The Comprehensive Plan update recognizes that advancing equity requires a multifaceted policy approach. While the Comprehensive Plan update addresses equity in narrower terms, such as “equitable development,” it recognizes that many areas of policy must be brought to bear on the challenge:

Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, health care, technology, workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts. 213.7

The Implementation Element calls for “the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis”^{2501.8}. The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan as part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan. And, as is the case whenever the Commission considers Comprehensive Plan consistency, the scope of the review and Comprehensive Plan policies that apply will depend on the nature of the proposed zoning action and what aspects of the outcome the Zoning Commission can control.

Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where certain priorities stand out. These include affordable housing, displacement, and access to opportunity. One of the key ways the Comprehensive Plan seeks to address equity is by supporting additional housing development. The Comprehensive Plan recognizes that without increased housing, the imbalance between supply and demand will drive up housing prices in a way that creates challenges for many residents, particularly low-income residents. The Comprehensive Plan further recognizes the importance of inclusionary zoning requirements in providing affordable housing opportunities for households of varying income levels.

Analysis

Referring to the Commission’s Racial Equity Tool, the requested zoning action would result in the opportunity for additional housing along a commercial corridor in a Neighborhood Conservation Areas where the philosophy is to “conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs”. The requested RA-2 zone coupled with IZ Plus, is consistent with the density as guided by the Future Land Use Map and Comprehensive Plan policies that call for more levels of housing affordability be accommodated in Neighborhood Conservation areas with access to opportunities, services, and amenities.

Demographics

The population of the Rock Creek West Planning Area (“Planning Area”), where the subject property is located, is predominately white, having a Black population at 7.9 percent of total residents, compared to 45.4 percent District-wide (2020 Census). The Hispanic/Latin origin population is 11.1 percent (2020 Census). In the 2020 Census, the median household income was \$145,909 in the

Planning Area, while the District-wide median was \$131,164. In 2016, the Planning Area had a median home value of \$922,520.

Housing Equity Report

According to the State Data Center, the Rock Creek West Planning Area consists of 13.5 percent of the total housing units in the District. The 2019 Housing Equity Report identified the Planning Area as having an affordable housing production goal of 1,990 units by 2025, the highest of all Planning Areas. At the time the report was written, the Planning Area had 80 units in the affordable housing pipeline and was not on track to meet the 2025 total housing production goal. Rock Creek West is identified as having the largest “Shortage of Affordable Housing” of all the planning areas. This rezoning would be coupled with IZ Plus and has the potential to provide 20% inclusionary units.

Residential Land Use by Type

Residential uses represent the largest single land use in the Planning Area, accounting for about 36 percent of the total. Of the residential acreage, 77 percent is developed with single-family detached homes. About 13 percent is developed with semi-detached homes, row houses, and other attached single-family housing. The remaining 10 percent is developed with multi-family apartments and condominiums. Higher density housing is concentrated along the Connecticut Avenue corridor, along Massachusetts Avenue NW between Ward Circle and Idaho Avenue NW, and along Lower Wisconsin Avenue NW. Densities in most of the area are well below the District-wide total, although individual blocks along the avenues contain some of the densest housing in Washington, DC (§ 2302.2).

RA-1 and RA-2

The current RA-1 zone permits a maximum FAR of 0.9, and 1.08 with IZ. The proposed RA-2 zone would permit a greater density of 1.8, and 2.16 with IZ. The RA-2 zone has the potential to create more residential units than the current zone, increasing the total supply of housing units in the Planning Area, which could help alleviate the pressure on housing costs overall.

The Comprehensive Plan defines affordable housing as housing available to households earning 80 percent or less of the median family income (“MFI”) (§ 304.3). As of 2018, the Planning Area included only 0.9 percent of the District’s total number of affordable housing units.

The rising cost of housing in the District limits the ability to provide housing for a variety of household types, including family and senior housing, rental and ownership housing, and housing for all income levels. Given the land use characteristics of the District only a small amount of the total land area (28.1 percent) is dedicated to residential use (§ 205.3). The scarcity of land increases the cost of building new housing, limits the availability of housing, and intensifies housing cost burdens, particularly for lower- and middle-income households. The Comprehensive Plan states that “*residents of color are a majority of lower-income households in the District and, therefore, face a disproportionate share of the problems caused by housing insecurity and displacement*” (§ 206.4).

A key piece of this map amendment is the potential to create additional affordable housing through an IZ Plus set-aside requirement. It is likely that the RA-2 zone could require a 20 percent set-aside requirement resulting in approximately eight to nine affordable housing units. The IZ program requires affordable housing units to be available to households earning either no more than 60 percent MFI for rental housing or 80 percent MFI for ownership housing. The potential affordable housing units that could be created under the requested RA-2 zone is higher than if the property was not rezoned. Making room for affordable housing has the potential to benefit non-white populations who on average have lower incomes than white residents.

Displacement

The proposed rezoning should not result in physical displacement of residents. The site is currently developed with two detached buildings consisting of single-family residences that would be relocated on the lot because they are contributing to the historic district. Both buildings are currently vacant and would not require residents to be relocated. Rezoning the lot would allow for the construction of additional housing and affordable housing units, consistent with the District's goals.

Transportation

The subject lot would have access to transit, as it would be located within approximately one mile of two Metro stations (Cleveland Park and Tenleytown Metro stations) and would be served by Priority Corridor Network Metrobus Routes along Wisconsin Avenue. Bikeshare stations provide additional connections throughout the neighborhood, as well as a network of sidewalks for pedestrians and other modes of travel. Improvements to the transportation network and public space may be required for mitigation once the property is developed.

Employment

The proposed rezoning could support employment opportunities. The site is also close to retail and offices located along Wisconsin Avenue that may provide employment. The Comprehensive Plan projects that the number of jobs in the Planning Area is expected to increase by 6,760 jobs in 2045, primarily near Metro stations as additional retail and local-serving office buildings are developed (§ 2306.2). As such, residents of the future development would benefit from its proximity to Metro stations and potential future employment opportunities.

Education

The subject property would be in-bounds for Eaton Elementary School, Hardy Middle School, and Wilson High School. Other institutional uses, including private schools, religious institutions, American University and University of the District of Columbia are in the area. Future residents of the development would benefit from the several educational facilities located nearby.

Recreation

The subject lot is located near several recreational facilities, including Rosedale Conservancy, Newark Park Playground, Newark Street Dog Park, and Macomb Recreation Center. Future residents would have access to a variety of recreation areas in the neighborhood.

Environmental

Any development on the property would be required to demonstrate compliance with the Green Building Act and to upgrade stormwater management to current requirements. The Applicant should take advantage of incentives and programs offered by the Department of Energy and Environment (DOEE) to develop the lot as sustainably and resilient as possible. The proximity to transit also supports a car-free or car-light lifestyle which results in lower emissions, better air quality, and safer streets.

Access to Amenities

The subject lot would have access to retail, including a grocery store, located nearby. The site is located in an amenity rich neighborhood that includes schools, universities, a library, a recreation center, and various parks and open space.

Citywide Elements

The map amendment proposal is not inconsistent with the Citywide Elements of the Comprehensive Plan and would further the policies of the Land Use, Transportation, Housing, and Environmental Protection Citywide Elements. A compilation of relevant policies can be found in Appendix I.

Land Use

The proposed map amendment would permit moderate density residential uses, including row houses and low-rise apartment buildings. These uses would be permitted in the current RA-1 zone, but at a lower density and height than permitted in the proposed RA-2 zone. Overall, the proposed map amendment would support the creation of more housing and affordable housing in a priority area located along a prominent corridor and near two Metro stations. Redevelopment of the site would result in the preservation of two historic detached buildings and compatible new development that would be reviewed by the Historic Preservation Review Board.

Transportation

The subject property is located approximately one mile from the Cleveland Park and Tenleytown-AU Metro stations. The map amendment would support the District's goals of providing more housing, including affordable housing, in proximity to safe, affordable, and reliable transportation regardless of a person's age, race, income, geography, or physical activity. Improvements to public space or the transportation network may be necessary to mitigate the impacts of the future development.

Housing

The proposed map amendment would increase the density for market-rate and affordable housing options in an area proximate to two Metro stations and along a priority corridor that includes neighborhood-serving retail. As discussed above, the proposed map amendment has the potential to increase the total supply of housing units in the Rock Creek West Planning Area, which would help alleviate pressure on housing costs. Based on the IZ calculations provided in this report, the proposed map amendment could double the affordable housing that would be provided on the lot.

The map amendment would require IZ Plus for any future residential development, which could help the District towards its goal of ensuring that one-third of the new housing built from 2018 to 2030 be affordable to persons earning 80 percent or less of the MFI. The application of an IZ Plus set-aside requirement would also support mixed-income housing by encouraging affordable housing near two Metro stations. The IZ Plus regulations also provide an incentive for property owners to provide larger family-sized units that are three-bedrooms or larger and an incentive for property owners to provide units for households earning 50 percent MFI or less.

Environmental Protection

The proposed map amendment would advance environmental goals, as new development would be required to comply with the Green Energy codes and stormwater management requirements, including green roofs and maximizing permeable surfaces. Tree preservation is strongly encouraged where possible.

Area Element

The subject property is in the Rock Creek West Area Element. A compilation of relevant policies can be found in Appendix I.

The proposed map amendment would allow for the development of housing and affordable housing in an amenity-rich area in proximity to two Metro stations. Development of the infill lot could improve the interface between the mixed-use development to the west and low-density residential to the east. New development should incorporate design transitions to the lower-scale residential use to the east in order to ameliorate the appearance of overwhelming scale and relate to the lower-scale context.

C. SUMMARY OF PLANNING CONTEXT ANALYSIS

The Comprehensive Plans contains several differing policies about low-density residential uses and zoning. LU-2.1.5 describes the need to support and maintain “the District’s established low-density neighborhoods and related low-density zoning” while Policy LU-2.1.8 describes the need to “explore approaches, including rezoning, to accommodate a modest increase in density and more diverse housing types.” This policy predicates any rezoning proposal on detailed neighborhood planning.

Though LU-2.1.5 supports the retention of low-density zoning, LU-2.1.8 acknowledges that there is also a need to increase density in low-density neighborhoods to help effectuate many other policies of the Comprehensive Plan, including the development of more market-rate and affordable housing. The change in zoning from low- to moderate-density to moderate-density is supported by LU-2.1.8 because the subject property is located near various modes of transportation and its development would diversity the type and cost of housing available along Wisconsin Avenue.

Though the proposed map amendment would change the zoning from low- to moderate-density to moderate-density residential, on balance, the proposal would not be inconsistent with the Comprehensive Plan. The policies cited in Appendix I and as discussed in the Citywide and Area Elements sections, work together to support increasing density to permit more housing, including affordable housing, along a priority corridor on an infill lot.

Finally, it is important to note the Mayor’s vision for the creation of 36,000 new housing units by 2025, including 12,000 affordable units. The map amendment would help the District towards attaining its affordable housing pipeline goals as identified in the Housing Equity Report and could help the Planning Area achieve a minimum of 15 percent of affordable units by 2025.

JS/be

Appendix I

Comprehensive Plan Citywide and Area Elements

The following is a compilation of the relevant Citywide and Area Elements for the proposed map amendment.

Chapter 3 Land Use

The Land Use Chapter provides the general policy guidance on land use issues across the District.

Policy LU-1.4.1: Station Areas as Neighborhood Centers

Encourage the development of Metro stations as anchors for residential, economic, and civic development and to accommodate population growth with new nodes of residential development, especially affordable housing, in all areas of the District in order to create great new walkable places and enhance access and opportunities for all District residents. The establishment and growth of mixed-use centers at Metrorail stations should be supported as a way to provide access to housing opportunities at all income levels and emphasize affordable housing, improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities that the stations provide. Station area development should have population and employment densities guided, but not dictated, by desired levels of transit service. This policy should be balanced with other land use policies, which include conserving neighborhoods. The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area. 307.9

Policy LU-1.4.3: Housing Around Metrorail Stations

Build housing adjacent to Metrorail stations that serves a mix of incomes and household types, including families, older adults, and persons with disabilities, and prioritize affordable and deeply affordable housing production. Leverage the lowered transportation costs offered by proximity to transit to increase affordability for moderate and low-income households. 307.11

Policy LU-1.4.4: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations

Explore and implement as appropriate mechanisms, which could include community land trusts, public housing, and shared appreciation models, to encourage permanent affordable rental and for-sale multi-family housing, adjacent to Metrorail stations, given the need for accessible affordable housing and the opportunity for car-free and car-light living in such locations. 307.12

Policy LU-1.4.6: Development Along Corridors

Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to respect the character, scale, and integrity of adjacent neighborhoods, using approaches such as building design, transitions, or buffers, while balancing against the District's broader need for housing. 307.14

Policy LU-1.5.1: Infill Development

Encourage infill development on vacant land within Washington, DC, particularly in areas where there are vacant lots that create gaps in the urban fabric and detract from the character of a commercial or residential street. Such development should reflect high-quality design, complement

the established character of the area and should not create sharp changes in the physical development pattern. 308.6

Policy LU-1.5.2: Long-Term Vacant Sites

Facilitate the reuse of vacant lots that have historically been difficult to develop due to infrastructure or access problems, inadequate lot dimensions, fragmented or absentee ownership, or other constraints. Explore lot consolidation, acquisition, and other measures that would address these constraints. 308.7

Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Recognize the importance of balancing goals to increase the housing supply, including affordable units, and expand neighborhood commerce with parallel goals to preserve historic resources, advance environmental and sustainability goals, and further Fair Housing. The overarching goal to create vibrant neighborhoods in all parts of the District requires an emphasis on conserving units and character in some neighborhoods and revitalization in others, including inclusive and integrated growth and meeting communities and public facility needs. All neighborhoods have a role to play in helping to meet broader District-wide needs, such as affordable housing, public facilities, and more. 310.10

Policy LU-2.1.8: Explore Approaches to Additional Density in Low- and Moderate-Density Neighborhoods

Notwithstanding Policy LU-2.1.5, explore approaches, including rezoning, to accommodate a modest increase in density and more diverse housing types in low-density and moderate-density neighborhoods where it would result in the appropriate production of additional housing and particularly affordable housing. Build upon the guidance of the April 2020 Single Family Housing Report to diversify the cost of housing available in high-opportunity, high-cost low- and moderate-density neighborhoods, especially near transit. However, neighborhood planning and engagement is a condition predicate to any proposals. Infill and new development shall be compatible with the design character of existing neighborhoods. Minimize demolition of housing in good condition.

Chapter 4 Transportation

Policy T-1.1.7: Equitable Transportation Access

Transportation within the District shall be accessible and serve all users. Residents, workers, and visitors should have access to safe, affordable and reliable transportation options regardless of age, race, income, geography or physical ability. Transportation should not be a barrier to economic, educational, or health opportunity for District residents. Transportation planning and development should be framed by a racial equity lens, to identify and address historic and current barriers and additional transportation burdens experienced by communities of color. 403.13

Policy T-1.2.1: Major Thoroughfare Improvements

Beautify and stabilize gateways and major thoroughfares by implementing coordinated multimodal transportation, economic development, and urban design improvements. 404.4

Chapter 5 Housing

Policy H-1.1.1: Private Sector Support

Encourage or require the private sector to provide both new market rate and affordable housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 503.3

Policy H-1.1.3: Balanced Growth

Strongly encourage the development of new housing, including affordable housing, on surplus, vacant, and underused land in all parts of Washington, DC. Ensure that a sufficient supply of land is planned and zoned to enable the District to meet its long-term housing needs, including the need for low- and moderate density single-family homes, as well as the need for higher-density housing. 503.5

Policy H-1.1.8: Production of Housing in High-Cost Areas

Encourage development of both market rate and affordable housing in high-cost areas of the District, making these areas more inclusive. Develop new, innovative tools and techniques that support affordable housing in these areas. Doing so increases costs per unit but provides greater benefits in terms of access to opportunity and outcomes. 503.10

Policy H-1.2.2: Production Targets

Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in Washington, DC from 2018 to 2030, or approximately 20,000 units, should be affordable to persons earning 80 percent or less of the area-wide MFI. In aggregate, the supply of affordable units shall serve low-income households in proportions roughly equivalent to the proportions shown in Figure 5.8: 30 percent at 60 to 80 percent MFI, 30 percent at 30 to 60 percent MFI, and 40 percent at below 30 percent MFI. Set future housing production targets for market rate and affordable housing based on where gaps in supply by income occur and to reflect District goals. These targets shall acknowledge and address racial income disparities, including racially adjusted MFIs, in the District, use racially disaggregated data, and evaluate actual production of market rate and affordable housing at moderate, low, very-low, and extremely-low income levels. 504.9

Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas

Proactively plan and facilitate affordable housing opportunities and make targeted investments that increase demographic diversity and equity across Washington, DC. Achieve a minimum of 15 percent affordable units within each Planning Area by 2050. Provide protected classes (see H-3.2 Housing Access) with a fair opportunity to live in a choice of homes and neighborhoods, including their current homes and neighborhoods. 504.17

Chapter 6 Environmental Protection Element

Policy E-2.1.2: Tree Requirements in New Development

Use planning, zoning, and building regulations to promote tree retention and planting, as well as the removal and replacement of dying trees when new development occurs. Tree planting and landscaping required as a condition of permit approval should include provisions for ongoing maintenance. 605.6

Policy E-2.3.2: Grading and Vegetation Removal

Encourage the retention of natural vegetation and topography on new development sites. Prevent or require mitigation of construction practices that result in unstable soil and hillside conditions. Grading of hillside sites should be minimized, and graded slopes should be quickly revegetated for stabilization. 607.3

Policy E-3.2.7: Energy-Efficient Building and Site Planning

Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. Encourage new development to exceed minimum code requirements and contribute to energy efficiency and clean energy goals. 612.9

Policy E-4.4.1: Mitigating Development Impacts

Future development should mitigate impacts on the natural environment and anticipate the impacts of climate change, resulting in environmental improvements wherever feasible. Construction practices that would permanently degrade natural resources without mitigation should not be allowed. 618.3

Policy E-5.1.3: Evaluating Development Impacts On Air Quality

Evaluate potential air emissions from new and expanded development, including transportation improvements and municipal facilities, and take measures to mitigate any possible adverse impacts, particularly to any adjoining residential uses. These measures should include construction controls to reduce airborne dust and transportation emissions. 620.12

Chapter 23 Rock Creek West Area Element

Policy RCW-1.1.4: Infill Development

Recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Map. When such development is proposed, work with ANCs, residents, and community organizations to encourage mixed-use projects that combine housing, including affordable housing, neighborhood-serving retail, and commercial uses. s. Design transitions between large- and small-scale development to ameliorate the appearance of overwhelming scale and to relate to context of lower-scale surrounding neighborhoods. 2308.5

Policy RCW-2.2.1: Housing Opportunities

Pursue the opportunity for additional housing, including affordable and moderate- income housing, with some retail and limited office space on Wisconsin Avenue and underdeveloped sites west of the Friendship Heights Metro station. 2312.7

Policy RCW-2.2.5: Land Use Compatibility Along Wisconsin Avenue NW

Future development along Wisconsin Avenue NW should be architecturally sensitive to adjoining residential neighborhoods. Use a variety of means to improve the interface between mixed-use districts and lower-scale residential uses, such as architectural design, the stepping down of building heights away from the avenue, landscaping and screening, and additional green space improvements. 2312.11